

N. Waiver and Work-Flex Requests

GDOL, as the Governor's designated administrator for the state's Workforce Investment Act activities, is requesting renewal of the waiver of regulatory prohibition on using Individual Training Accounts (ITAs) for older youth. In compliance with WIA Section 189(1)(4)(B) and WIA Interim Final Regulation 29 CFR 661.420(c), please accept the following request to renew the waiver as presented below.

A. Statutory Regulation to be Waived

WIA Interim Final Regulation 29 CFR 664.510 prohibits the use of ITAs for older youth. Georgia requests to continue the use of ITAs for older youth, as previously approved by the U.S. Department of Labor on January 21, 2003.

B. Goals to be Achieved by the Waiver

1. Ensures continued flexibility for local WIBs to design and deliver programs based on the needs of their customers rather than restricting those services based on age
2. Reduces paperwork and tracking processes required for dual enrollment, where an area would otherwise have to register an older youth in both the youth and adult systems to provide them with occupational skills training using the ITA system
3. Continues the opportunity for systems to provide older youth with the real-life learning experience of making an informed career decision. Use of the ITA system also provides case management staff with the opportunity to work with the older youth customer regarding training and career opportunities
4. Streamlines performance management by counting these customers only once in performance measures. This encourages local areas to continue services to the challenging older youth population.
5. Maintains the option of charging training to older youth through the youth funding stream, allowing for efficient tracking of expenditures and promoting full use of youth funding

C. State or Local Statutory or Regulatory Barriers

There are no existing state or local statutory or regulatory barriers to the successful implementation of this waiver renewal request.

D. Description of the Goals of the Waiver and Expected Outcomes

The Workforce Investment Act has shifted the focus of youth programs from the provision of short-term, stand-alone job training to year-round, long term services for in-school and out of school youth. While this has proven to be an effective approach, flexibility is needed in serving those youth not interested in a structured, long-term service approach. It continues to be challenging to effectively serve out of school youth, as they are most interested in obtaining full-time employment leading to self-sufficiency.

Georgia fully recognizes the WIA provision that requires systems to provide a menu of ten program elements to eligible youth. Youth often need more services over a longer period of time to be successful, while ITAs generally address only the element of occupational skills training. Thus, the state will continue to require local areas to make all ten youth service elements available to these customers, to facilitate their successful transition to post-secondary training and careers. Local WIBs are asked to outline in their strategic plans how these elements, including a minimum of 12 months of follow-up services, will be provided to those youth served through the ITA system.

It should also be noted that the option for dual enrollment of older youth into youth and adult services will be available for local use as needed.

E. Description of the Individuals Impacted by the Waiver

The waiver will facilitate quality services to eligible older youth. These customers will receive the type of services that address their individual needs, without duplicative paperwork and tracking.

F. Description of the Process to Monitor Progress

Local WIBs will monitor this process and will have the opportunity to review its success and make any necessary modifications through their strategic plan updates. State staff also review areas' compliance with federal requirements (e.g., provision of the ten youth elements) during the annual review process.

G. Opportunity for Local Boards to Comment on the Waiver Request

Local WIBs were asked if they wished this waiver option to continue, and interest was expressed in continuing the flexibility afforded through the waiver.

H. Additional Information – TEGL 12-01 (February 21, 2002)

1. What guidelines will be provided to local areas on the use of ITAs?

As the Governor's designated administrator of Georgia's WIA activities, GDOL will issue renewed authority for the 20 local WIBs to pursue the use of ITAs for older youth once the request is approved by the U.S. Department of Labor.